**MOTION TO MODIFY BOND CONDITIONS**

##### State of Wisconsin

PLEASE TAKE NOTICE that on the \_\_\_\_\_\_\_\_ day of , 20\_\_, at \_\_\_\_\_\_\_\_\_\_\_\_\_\_.M., or as soon thereafter as the State may be heard, the State of Wisconsin, plaintiff, will move the court for a modification of the conditions of bond in the above-referenced case. Specifically, the State asks that the court impose a condition of bond prohibiting the defendant from having any contact with minors under the age of 18 years of age.

As grounds therefore, the State asserts that based upon the factual information set forth in the criminal complaint, as well as the factual information attached to the State's motion for the introduction of other crimes evidence, that the defendant poses a risk of committing sexual assaults against minor children, and therefore should be barred from having contact with same. Further, based upon the information that the State presently holds with respect to the defendant's living conditions, it is the State's understanding that the defendant is currently residing in a residence where the defendant has daily contact with a minor male individual, who is under the age of 18. The defendant may also have access to other minor children within that same residence. All of the prior acts alleged against the defendant involve sexual assaults with family members within the family residential setting. Therefore, the State respectfully requests that the court modify the conditions of bond to prohibit the defendant from having any contact with anyone under the age of 18.

Dated:

Respectfully submitted,

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Assistant District Attorney